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CLIENT/MATTER N UMBER 0854373044

October 8, 2007

## VIA FACSIMILE AND U.S. MAIL

Barbara Chisholm Altshuler Berzon LLP 177 Post Street, Suite 300 San Francisco, CA 94108

> Stanford Hospital & Clinics/ Lucile Packard Children's Hospital's Information Request Concerning SEIU Local 715 (Second)

Dear Ms. Chisholm:

On August 1, 2007, I faxed and mailed to you a second information request regarding Local 715 and Local 521. I presume you received a copy of the request by one or both means, as we have confirmation of successful transmittal by facsimile. However, to date I have received no response, nor even any acknowledgment of receipt of the request.

Please provide the information requested in the attached letter dated August 1, 2007, by no later than Friday, October 19, 2007. Failure to do so will be regarded as a refusal by SEIU. Local 715 to provide requested relevant information.

Sincerely,

Laurence R. Arnold

LRA:sey

Laurie Quintel cc:

BOSTON BRUSSELS CHICAGO **JACKSONVILLE** 

LOS ANGELES MADISON MILWAUKEE **NEW YORK** ORLANDO

SACRAMENTO SAN DIEGO SAN DIEGO/DEL MAR SAN FRANCISCO SILICON VALLEY

TALLAHASSEE TAMPA WASHINGTON, D.C. page 1



#### ATTORNEYS AT LAW

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CLIENT/MATTER NUMBER 085437-3044

August 1, 2007

### VIA FACSIMILE AND U.S. MAIL

Barbara Chisholm Altshuler Berzon LLP 177 Post Street, Suite 300 San Francisco, CA 94108

Re: SEIU Local 715 Information Request (Second)

Dear Ms. Chisholm:

As you know, Stanford Hospital & Clinics and Lucile Packard Children's Hospital have outstanding information requests regarding Local 715 and Local 521. Although the Hospitals have repeatedly requested this information, the union has continued to refuse to comply, and most recently, has ignored the request altogether. Nevertheless, the Hospitals' request remains.

In addition to that information, however, and in light of the claim that a trustee has been appointed, the Hospitals seek additional information. Please provide the following:

- 1. The name and position held of each employee on the active payroll and who received pay in of the first pay period of each of the months of April, May and June of 2007, and the name of each employee on the active payroll on June 7, 2007.
- 2. The name and title of each officer of Local 715 as of the first day of each of the months of April, May and June of 2007, and on June 7, 2007, and the amounts of compensation and expense reimbursements paid to each.
- 3. A list of assets as the first day of each of the months of April, May and June of 2007, and on June 7, 2007.
- 4. A list of assets transferred or sold in each of the months of April, May and June of 2007.
- 5. A list of assets acquired in each of the months of April, May and June of 2007.

TALLAHASSEE TAMPA Dago 2



Barbara Chisholm August 1., 2007 Page 2

Your prompt provision of the above information is requested, and will be appreciated.

Sincerely,

Laurence R. Arnold

LRA:reb

cc: Laurie Quintel

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Sender's Direct Dial: 415.984.9819

Date: August 1, 2007

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Date: October 8, 2007

Client/Matter No: 085437-3044

User ID No: 0034

#### **MESSAGE:**